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6 *Special Insurance Counsel to*  
7 *The Official Committee of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

10 In re

11 THE ROMAN CATHOLIC ARCHBISHOP  
12 OF SAN FRANCISCO,

13 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

**MONTHLY PROFESSIONAL FEE**  
**STATEMENT FOR BURNS BAIR LLP**  
**FOR FEBRUARY 2024**

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15 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

16 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP, special insurance counsel to the  
17 Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional  
18 fee statement for the period February 1, 2024 through February 29, 2024 (the “Fee Period”),  
19 pursuant to the *Order Establishing Procedures and Authorizing Payment of Professional Fees and*  
20 *Expenses on a Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No.  
21 212]. The total fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the  
22 Fee Period are as follows:

Period	Fees	Expenses	Total
February 1, 2024 – February 29, 2024	\$32,367.00 <sup>1</sup>	\$2.00	\$32,369.00
Net Total Allowed Payments this Statement Period (80% of fees and 100% of expenses)	\$25,893.60	\$2.00	\$25,895.60

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27 <sup>1</sup> Burns Bair will contribute ten percent of all fees it receives in this case on a final basis to a settlement trust that is  
28 approved as part of a plan of reorganization. As such fees are paid, Burns Bair will hold those funds in a trust account  
until a settlement trust is established through a plan of reorganization.

1 Attached hereto at **Exhibit 1** is Burns Bair's itemized billing statement for its fees and  
2 expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed  
3 Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The  
4 Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the  
5 Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly  
6 professional fee statement.

7 Dated: March 20, 2024

**BURNS BAIR LLP**

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9 By: /s/ Jesse J. Bair  
Jesse J. Bair

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11 *Special Insurance Counsel to the Official*  
12 *Committee of Unsecured Creditors*  
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# EXHIBIT 1

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 3/13/2024

**Bill # :** 01378

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/1/2024	Jesse Bair	Review correspondence with B. Michael and state court counsel re in-person Committee meeting (.1);	0.10	\$90.00
2/13/2024	Timothy Burns	Participate in portion of state court counsel meeting for insurance purposes re case strategy presentation (.7);	0.70	\$784.00
2/13/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case strategy and next-steps (1.0);	1.00	\$900.00
2/20/2024	Jesse Bair	Prepare for state court counsel meeting (.1); participate in state court counsel meeting for insurance purposes re case strategy plan (.4);	0.50	\$450.00
<b>Totals for Committee Meetings</b>			<b>2.30</b>	<b>\$2,224.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/3/2024	Jesse Bair	Review and edit Burns Bair invoice for inclusion with monthly fee submission (.4); correspondence with B. Horn-Edwards re same (.1);	0.50	\$450.00
2/5/2024	Jesse Bair	Correspondence with the Committee re Burns Bair's monthly fee statement (.1);	0.10	\$90.00
2/11/2024	Jesse Bair	Correspondence with B. Horn-Edwards re Burns Bair's first interim fee application (.1);	0.10	\$90.00
2/12/2024	Brenda Horn-Edwards	Draft monthly professional fee statement (.2); draft certificate of service (.1); correspond with J. Bair (.1);	0.40	\$136.00

2/15/2024	Jesse Bair	Review and edit Burns Bair's monthly fee statement (.1); correspondence with B. Horn-Edwards re finalizing and filing same (.1);	0.20	\$180.00
2/15/2024	Brenda Horn-Edwards	File monthly professional fee statement in CM/ECF (.1); Email monthly professional fee application to service list and J. Bair (.1);	0.20	\$68.00
2/16/2024	Brenda Horn-Edwards	Draft Burns Bair's first interim fee application (2.1); prepare and edit exhibits to same (1.3); correspond with J. Bair re same (.1);	3.50	\$1,190.00
2/16/2024	Jesse Bair	Correspondence with B. Horn-Edwards re Burns Bair first interim fee application (.1);	0.10	\$90.00
2/22/2024	Jesse Bair	Begin reviewing Burns Bair's first interim fee application (.1); correspond with G. Andrews re same (.1);	0.20	\$180.00
2/26/2024	Jesse Bair	Participate in call with G. Brown re first interim professional fee applications (.3); review and respond to correspondence with G. Brown re same and hearing issues (.2);	0.50	\$450.00
2/27/2024	Brenda Horn-Edwards	Revise and edit Burns Bair's first interim fee application and exhibits (.3);	0.30	\$102.00
2/27/2024	Jesse Bair	Continue reviewing and editing Burns Bair's first interim fee application (.8);	0.80	\$720.00
2/27/2024	Jesse Bair	Correspondence with B. Horn-Edwards re edits needed to Burns Bair's first interim fee application (.2); participate in call re same (.2);	0.40	\$360.00
2/27/2024	Jesse Bair	Correspondence with PSZJ re omnibus notice of Committee interim fee applications (.1); participate in call with PSZJ re same (.1);	0.20	\$180.00
2/28/2024	Jesse Bair	Revise and edit Burns Bair's first interim fee application and exhibits (1.5);	1.50	\$1,350.00
2/28/2024	Jesse Bair	Review and edit J. Bair certification in support of Burns Bair's first interim fee application and related exhibit (.2);	0.20	\$180.00
2/28/2024	Jesse Bair	Review draft omnibus notice of hearing re the Committee's first interim fee applications (.1);	0.10	\$90.00
2/28/2024	Jesse Bair	Correspond with B. Horn-Edwards and PSZJ re Burns Bair's first interim fee application (.1);	0.10	\$90.00
2/29/2024	Jesse Bair	Correspondence with B. Horn-Edwards re filing and service of Burns Bair's first interim fee application (.1);	0.10	\$90.00
2/29/2024	Brenda Horn-Edwards	File Burns Bair interim fee application and declaration of J. Bair in CM/ECF (.2); correspond with J. Bair (.1);	0.30	\$102.00

**Totals for Fee Applications 9.80 \$6,188.00**

## Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/1/2024	Jesse Bair	Review and consider draft stipulation resolving certain insurers' motion to lift the stay (.2); correspondence with the Debtor re issues in connection with same (.1);	0.30	\$270.00
2/1/2024	Jesse Bair	Review debtor correspondence re recent document production (.1);	0.10	\$90.00
2/2/2024	Timothy Burns	Review stipulation re relief from stay motion re state court insurance action and related approval papers (.2);	0.20	\$224.00
2/3/2024	Timothy Burns	Review insurers' status report re motion for relief (.1);	0.10	\$112.00
2/3/2024	Jesse Bair	Review certain insurers' status report to the Court re their motion to lift the stay (.1);	0.10	\$90.00
2/3/2024	Jesse Bair	Correspondence with J. Stang re the draft stipulation to resolve certain insurers' motion to lift the stay (.1);	0.10	\$90.00
2/4/2024	Jesse Bair	Correspond with the Debtor re the Committee's non-opposition to stipulation resolving certain insurers' motion to lift the stay (.1);	0.10	\$90.00
2/5/2024	Jesse Bair	Correspondence with the Debtor re finalization and submission to Court re stipulation resolving certain insurers' motion to lift stay (.1);	0.10	\$90.00
2/5/2024	Jesse Bair	Review and edit draft Committee presentation on case strategy, including addition of specific insurance inserts (.6);	0.60	\$540.00
2/5/2024	Jesse Bair	Participate in conference with J. Stang, B. Michael, and T. Burns re formulating the Committee's overall case strategy and next-steps (1.5);	1.50	\$1,350.00
2/5/2024	Jesse Bair	Additional consideration and analysis of potential case insurance strategies (.1);	0.10	\$90.00
2/5/2024	Timothy Burns	Analysis regarding potential insurance case strategies (.2);	0.20	\$224.00
2/5/2024	Timothy Burns	Participate in call with PSZJ and J. Bair re preparation of overall case strategy (1.5);	1.50	\$1,680.00
2/5/2024	Timothy Burns	Review stipulation to withdraw certain insurers' motion to lift stay and related papers (.2); review correspondence with the debtor and J. Bair re same (.1);	0.30	\$336.00
2/5/2024	Brian Cawley	Work in connection with reviewing and assessing the Debtor's insurance document production (.3);	0.30	\$165.00
2/6/2024	Brian Cawley	Research TH Agriculture & Nutrition insurance Plan details for potential use in connection with ASF Plan (.9);	0.90	\$495.00

2/6/2024	Jesse Bair	Correspond with B. Cawley re research needed re parameters for post-confirmation lawsuits against debtor in order to trigger non-settling insurance under 9th Circuit law (.1);	0.10	\$90.00
2/6/2024	Jesse Bair	Review correspondence with B. Michael and the Committee re case developments (.1);	0.10	\$90.00
2/6/2024	Jesse Bair	Review additional correspondence with the debtor and Chubb re stipulation resolving certain insurers' motion to lift the stay (.1);	0.10	\$90.00
2/6/2024	Brian Cawley	Draft summary of preliminary research results re post-confirmation litigation issues under California and 9th Circuit law in connection with obtaining non-settling insurance recoveries (.6);	0.60	\$330.00
2/6/2024	Brian Cawley	Research post-confirmation litigation issues under California and 9th Circuit law in connection with obtaining non-settling insurance recoveries (1.5);	1.50	\$825.00
2/8/2024	Timothy Burns	Review B. Cawley's preliminary research summary re post-bankruptcy action requirement to proceed against non-settling insurance companies (.1); meet with J. Bair re same (.1);	0.20	\$224.00
2/8/2024	Brian Cawley	Conduct supplemental, detailed research re post-confirmation litigation issues under California and 9th Circuit law in connection with obtaining non-settling insurance recoveries (4.0);	4.00	\$2,200.00
2/8/2024	Brian Cawley	Draft summary of supplemental, detailed research re post-confirmation litigation issues under California and 9th Circuit law in connection with obtaining non-settling insurance recoveries (1.2);	1.20	\$660.00
2/8/2024	Brian Cawley	Additional research and analysis re insurance neutrality provision issues from case relied on by the insurers (1.6);	1.60	\$880.00
2/8/2024	Timothy Burns	Review correspondence from B. Cawley re TH Agriculture & Nutrition Plan to review in connection with insurance neutrality issues (.1);	0.10	\$112.00
2/8/2024	Timothy Burns	Review and respond to correspondence from B. Michael re case strategy presentation to state court counsel (.1);	0.10	\$112.00
2/8/2024	Timothy Burns	Work in connection with revising insurance strategy component of Committee case strategy PowerPoint presentation (.6);	0.60	\$672.00

2/8/2024	Jesse Bair	Review B. Cawley email memo re parameters of post-confirmation lawsuits against the debtor for purposes of triggering non-settling insurance (.1); correspond with B. Cawley re supplemental research needed in connection with same (.1); conference with T. Burns re same (.1);	0.30	\$270.00
2/9/2024	Jesse Bair	Analyze revised version of the Committee's case strategy PowerPoint presentation (.2); review correspondence with state court counsel re same (.1);	0.30	\$270.00
2/13/2024	Brian Cawley	Respond to J. Bair request for coverage chart information (.2);	0.20	\$110.00
2/14/2024	Jesse Bair	Review correspondence with PSZJ, the debtor, and the insurers re protective order issues (.2);	0.20	\$180.00
2/20/2024	Jesse Bair	Review correspondence from state court counsel re potential test case options (.1);	0.10	\$90.00
2/21/2024	Jesse Bair	Analysis re insurance demand letter issues (.1);	0.10	\$90.00
2/21/2024	Jesse Bair	Review B. Michael correspondence re call with the Debtor re insurance case insurance issues (.1);	0.10	\$90.00
2/21/2024	Timothy Burns	Review UST's supporting memorandum in support of its motion to appoint a fee examiner (.1);	0.10	\$112.00
2/22/2024	Jesse Bair	Correspond with PSZJ re case strategy presentation for the Committee (.1);	0.10	\$90.00
2/23/2024	Jesse Bair	Review J. Stang correspondence with the Committee re Boy Scout appellate update and connection with ASF case (.1);	0.10	\$90.00
2/26/2024	Timothy Burns	Met with J. Bair re case strategy and associate assignments (.3); met with BB team re same (.3);	0.60	\$672.00
2/26/2024	Brian Cawley	Prepare for and participate in meeting with partners regarding case status and assignment of projects (.3);	0.30	\$165.00
2/26/2024	Jesse Bair	Correspondence with B. Cawley re test case insurance analysis (.1);	0.10	\$90.00
2/26/2024	Jesse Bair	Correspondence with B. Cawley re preparing discovery requests to the carriers (.1);	0.10	\$90.00
2/26/2024	Jesse Bair	Participate in conference with T. Burns re case status, insurance strategy, and related case projects (.3);	0.30	\$270.00
2/26/2024	Jesse Bair	Participate in BB team meeting re case updates and ongoing insurance projects (.3);	0.30	\$270.00
2/26/2024	Brian Cawley	Analyze the debtor's insurance document production to identify relevant coverage correspondence with the insurers (1.5);	1.50	\$825.00



2/27/2024	Brian Cawley	Correspondence with partners re potential deficiencies with the debtor's insurance document production (.1);	0.10	\$55.00
2/27/2024	Brian Cawley	Continue analyzing the debtor's insurance document production in connection with relevant coverage correspondence (.6);	0.60	\$330.00
2/27/2024	Brian Cawley	Analyze available coverage for proposed test cases (1.3);	1.30	\$715.00
2/27/2024	Brian Cawley	Draft summary of available coverage for potential test cases (1.8);	1.80	\$990.00
2/28/2024	Brian Cawley	Research particular issues re California bad faith and duty to settle law (1.8);	1.80	\$990.00
2/28/2024	Brian Cawley	Draft insurance document requests to each of the relevant insurers (4.7);	4.70	\$2,585.00
2/28/2024	Brian Cawley	Discuss with J. Bair insurance issues re potential test cases (.1); correspond with J. Bair re insurance document and information requests (.1);	0.20	\$110.00
2/28/2024	Brian Cawley	Analysis and respond to T. Burn questions regarding available coverage and per occurrence limits for certain potential test cases (1.4);	1.40	\$770.00
2/28/2024	Jesse Bair	Answer B. Cawley questions re insurance analysis re potential test cases (.1);	0.10	\$90.00
2/28/2024	Jesse Bair	Correspond with B. Cawley re drafting discovery requests on the insurers (.1);	0.10	\$90.00
2/29/2024	Jesse Bair	Review and edit draft discovery requests to the insurers (.4);	0.40	\$360.00
2/29/2024	Jesse Bair	Correspondence with B. Cawley re additional edits needed to Committee discovery requests to the insurers (.2);	0.20	\$180.00
2/29/2024	Jesse Bair	Conference with B. Cawley re ongoing case insurance projects (.1);	0.10	\$90.00
2/29/2024	Brian Cawley	Revise the insurance documents requests to incorporate J. Bair's suggested edits (1.0); conference with J. Bair re ongoing case insurance projects (.1);	1.10	\$605.00
<b>Totals for Insurance Recovery Activities</b>			<b>35.40</b>	<b>\$23,955.00</b>

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<b>Total Hours and Fees</b>	<b>47.50</b>	<b>\$32,367.00</b>
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#### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/01/2024	Fourth Quarter 2023 PACER	\$2.00
<b>Total Expenses</b>		<b>\$2.00</b>

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### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	4.70	\$340.00	\$1,598.00
Brian Cawley	Associate	25.10	\$550.00	\$13,805.00
Jesse Bair	Partner	13.00	\$900.00	\$11,700.00
Timothy Burns	Partner	4.70	\$1,120.00	\$5,264.00

**Total Due This Invoice: \$32,369.00**